

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

<div>In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>  Debtors.<sup>1</sup></div>	<div>PROMESA Title III  Case No. 17 BK 3283-LTS  (Jointly Administered)</div>
<div>In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  PUERTO RICO ELECTRIC POWER AUTHORITY,  Debtor.</div>	<div>PROMESA Title III  Case No. 17 BK 4780-LTS  Re: ECF Nos. 815 (Case No. 17-4780), 2985 (Case No. 17-3283)</div>
<div>MASTER LINK CORPORATION,  Movant,  -against-  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  PUERTO RICO ELECTRIC POWER AUTHORITY,  Respondent.</div>	<div><b>Motion in Compliance with Order Relates Only to PREPA and Shall Only be Filed in Case Nos. 17 BK 3283-LTS and 17 BK 4780- LTS</b></div>

<sup>1</sup> The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**JOINT MOTION IN COMPLIANCE WITH ORDER RELATED TO  
MASTER LINK CORPORATION'S MOTION FOR RELIEF OF STAY**

To the Honorable United States District Court Judge Laura Taylor Swain:

On behalf of the Puerto Rico Electric Power Authority (“PREPA”), the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority*, Act 2-2017, and Movant, Masterlink Corporation (“ML”), respectfully submit this Joint Motion in Compliance with Order (the “Motion”). In support of the Motion, the parties respectfully state as follows:<sup>2</sup>

1. On July 16, 2018, this Court issued an order granting ML’s unopposed request for an extension of time to file a joint report and extended the deadline to July 25, 2018. [Dkt. No. 3524.] The joint report pertains to this Court’s order entered on May 1, 2018 (the “Initial Order”) concerning the parties’ “efforts to seek to develop a mutually acceptable resolution of the outstanding performance bond issue or, at minimum, an agreed statement regarding the nature and pendency of the stayed litigation that can be used in connection with inquiries as ML’s bids for business.” [Dkt. No. 2985 at 6.]

2. In compliance with the Initial Order, on July 25, 2018, the parties informed the Court of the efforts made by both parties to reach an agreement as related to the nature and pendency of the stayed litigation and ML’s concerns regarding the potential impact of the pending litigation in relation to its commercial prospects with PREPA. [Dkt. No. 3696]

3. At the time, the parties requested until October 7, 2018 to inform the Court of the status of a mutually agreeable statement regarding both parties’ concerns going forward.

---

<sup>2</sup> The Financial Oversight and Management Board for Puerto Rico, as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”), has authorized AAFAF to join in this Motion on behalf of PREPA.

4. The parties hereby inform the Court that the parties are in communication and still in the process of discussing possible alternatives and drafting a mutually acceptable statement.

5. Notwithstanding, the parties are exchanging the draft versions and the documents.

6. Accordingly, the parties respectfully request that the parties provide the Court a joint status report on these additional efforts on or before October 22, 2018.

**WHEREFORE**, the herein appearing party respectfully requests the Honorable Court to grant the requested extension of time, until October 22, 2018.

**WE HEREBY CERTIFY** that on this date, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 5<sup>th</sup> of October, 2018.

**THE PUERTO RICO FISCAL  
AGENCY AND FINANCIAL  
ADVISORY AUTHORITY, as Fiscal  
Agent for PREPA**

By its attorneys,

/s/ Kevin D. Finger

Kevin D. Finger (*admitted pro hac vice*)  
David D. Cleary (*admitted pro hac vice*)  
Greenberg Traurig, LLP  
77 West Wacker Drive Suite 3100

**MOVANTS MASTERLINK**

S/ **Alexis A. Betancourt Vincenty**  
Alexis A. Betancourt Vincenty  
USDC-PR No. 301304  
Lugo Mender Group, LLC  
100 Carr. 165 Suite 501  
Guaynabao, P.R. 00968-8052  
Tel. (787) 707-0404  
Fax (787) 707-0412  
a\_betancourt@lugomender.com

Chicago, IL 60601  
Phone: 312.456.8400  
Fax: 312.456.8435  
Email: fingerk@gtlaw.com  
clearyd@gtlaw.com

Nathan A. Haynes (*admitted pro hac vice*)  
Greenberg Traurig, LLP  
200 Park Avenue  
New York, NY 10166  
Phone: 212.801.9200  
Fax: 212.801.6400  
Email: mitchelln@gtlaw.com  
haynesn@gtlaw.com

Joseph P. Davis (*admitted pro hac vice*)  
Greenberg Traurig, LLP  
One International Place, Suite 2000  
Boston, MA 02110  
Phone: 617.310.6000  
Fax: 617.310.6001  
Email: davisjo@gtlaw.com

**THE PUERTO RICO ELECTRIC  
POWER AUTHORITY**

By its attorneys,

/s/ Arturo Díaz Angueria  
USDC No. 117907

/s/ Katiuska Bolaños Lugo  
USDC No. 231812  
CANCIO, NADAL, RIVERA & DÍAZ,  
P.S.C.  
PO Box 364966  
San Juan, PR 00936-4966  
Phone: (787) 767-9625  
Fax: (787) 764-4430  
Email: adiaz@cnrd.com  
kbolanos@cnrd.com

Dated: October 5, 2018  
San Juan, Puerto Rico